

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Ind. No. 13-CR-356

v.

VAUGHN RICHMOND,

Defendant.

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STATE OF NEW YORK):
): s.s.
COUNTY OF NEW YORK):

I, Constantine Theodore Anastasakis, hereby affirm under the penalties of perjury the following:

1. I was born in New York City, New York. My family immigrated to the United States from Greece in the 1960s. My family owns property and maintains business interests in both the United States and Greece.
2. I reside at 31-01 Vernon Boulevard, Unit 208, Astoria, NY 11106.
3. While my given name is Constantine Theodore Anastasakis, because I have business interests in Greece, I often go by the Greek spelling of my name Konstantinos for business purposes (there is no C in the Greek alphabet). I am also referred to as Dino by those who know me.

4. I am the founder and managing director of Malvasia Management Group, a company focused on real estate development projects in New York and elsewhere. The company was created in 2014.

5. I have known Vaughn Richmond for the past three years, and our relationship has strengthened over the course of the past year.

6. In May 2018, I offered Mr. Richmond an opportunity to work with Malvasia. Because I was traveling, however, I was unable to coordinate the details of that employment and it prevented Mr. Richmond from starting work. Mr. Richmond was at all times ready to begin.

7. On July 12, 2018, I was finally able to solidify the details of Mr. Richmond's role with Malvasia as Director of Real Estate Development. I prepared an offer letter for him setting forth his position, and a starting salary of \$42,000 per year. I signed the agreement and it was countersigned by Mr. Richmond.

8. It has come to my attention that the government has accused Mr. Richmond of submitting a bogus letter. That accusation is false. In fact, I have reviewed the offer letter which Mr. Sapone submitted to the Court as Exhibit A of his July 18, 2018 letter, and it is the offer letter that I prepared and signed. The letter is authentic, true and accurate.

9. It has been brought to my attention that the telephone number listed in the letterhead on this offer letter is a non-working number. This is the result of an unfortunate typo. The last four digits of the telephone number should read 9102 instead of 9120.

10. The correct telephone number, ending in 9102, is in fact a working number for the business.

11. Malvasia is a small company that I have predominantly run myself since its inception, and the letterhead on which the letter was written is new. The correct number is listed on the company's website.

12. On July 12, 2018, I also prepared a letter on Mr. Richmond's behalf seeking to explain the unfortunate misunderstanding when his Probation Officer went to the address listed for Malvasia: 457 West 56th Street, New York, NY 10019.

13. I have reviewed the letter which Mr. Sapone's Firm submitted to the Court as Exhibit B of his July 18, 2018 letter, and it is a true and accurate copy of the letter that I prepared and signed on that date.

14. Both of the letters offered to the Court by Mr. Sapone's Firm were authored and signed by me. They are valid and legitimate and reflect my genuine desire to have Mr. Richmond work with me at Malvasia Management Group.

15. Mr. Richmond did not in any way falsify the letters. He asked for documentation that could be submitted to the Probation Office and the Court to prove his employment, and I was happy to oblige.

16. It has also been brought to my attention that contact was made with family members of mine at Simpson and Co., a family-owned company at the listed address for Malvasia. The Flower shop was owned by my late father Ted Anastasakis. It is now owned by my brother George and his wife Catherine.

17. Sadly, my family is in the midst of a contentious dispute over the distribution of family assets following the death of my father, and my brother's family and I are not on good terms. Therefore, I cannot speak to what my brother may have said when asked about me, or my business interests.

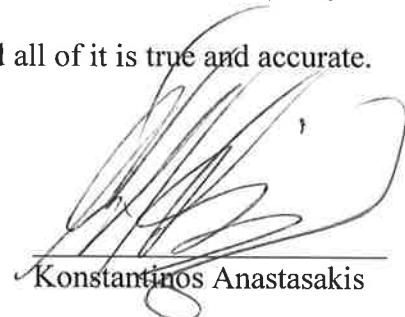
18. The current address for Malvasia, where Simpson & Co. is located, is owned by my family. The listed owner is LTA Properties, which is run by Lillian Anastasakis, my mother, and LTA is an acronym for Lillian and Ted Anastasakis. I started working on Malvasia while I was living in the residential portion of the building several years ago.

19. While the listed address for Malvasia is 457 West 56th Street, New York, NY 10019, Mr. Richmond and I have been hard at work securing office space elsewhere in midtown Manhattan from which we intend to run Malvasia moving forward.

20. I believe Mr. Richmond has much to offer my company, and I look forward to utilizing his skills and desire to continue to build on the work Malvasia is already engaged in.

21. If the Court requires any additional information from me, I am more than willing to be in court with Mr. Richmond on July 24, 2018, at 2:00pm.

22. I make this statement freely and voluntarily to Mr. Richmond's attorneys to be supplied to the Court. I have been informed that I do not have to make any statement but I felt the Court should know this information directly from me since it started with me. I have not been promised anything to make this statement nor have I been threatened or coerced in any way in order to make this statement. I have read the above statement and all of it is true and accurate.



Konstantinos Anastasakis

Sworn to before me this
23 day of July 2018



Chase Scott Ruddy
Notary Public

CHASE SCOTT RUDDY
NOTARY PUBLIC-STATE OF NEW YORK
No. 02RU8257784
Qualified in New York County
My Commission Expires 03-19-2020